



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 08 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL NO.: 7009 1680 0000 7647 2678
RETURN RECEIPT REQUESTED

Mr. David Donathen
HSE Manager
Dexter Axle Company
2900 Industrial Parkway East
Elkhart, Indiana 46516

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: IND044210896

Dear Mr. Donathen:

On September 13, 2016, a representative of the U.S. Environmental Protection Agency inspected Dexter Axle Company (Dexter Axle) located at 500 South 7th Street, Albion, Indiana (Dexter Axle or the facility). As a generator of hazardous waste, Dexter Axle is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Dexter Axle's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Dexter Axle, EPA's review of records pertaining to the Dexter Axle facility, the observations of the inspector, and a submittal of information by Dexter Axle on October 11, 2016, EPA has determined that Dexter Axle has unlawfully stored hazardous waste without a permit or interim status at the facility because Dexter Axle failed to comply with certain conditions for a RCRA permit exemption under 329 IAC 3.1-7-1 and 40 C.F.R. § 262.34(d). See paragraphs 1 through 5 below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). See 329 IAC 3.1-7-1 *et seq.* and 40 C.F.R. Part 265.

When a hazardous waste generator loses its RCRA permit exemption status because it failed to comply with conditions for a RCRA permit exemption pursuant to 329 IAC 3.1-7-1 and 40 C.F.R. § 262.34(d), the generator: (a) becomes an operator of a hazardous waste storage facility;

and (b) simultaneously must comply with the TSD requirements at 329 IAC 3.1-10-1 *et al* and 40 C.F.R. Part 265. Based on the information provided by Dexter Axle, EPA's review of records pertaining to the Dexter Axle facility, and the observations of the EPA inspector, EPA has determined that in addition to violating 329 IAC 3.1-7-1 and 40 C.F.R. § 262.34(d), Dexter Axle also violated 329 IAC 3.1-10-1 *et seq* and 40 C.F.R. Part 265, as well as 329 IAC 3.1-16 and 40 C.F.R. 279. See paragraphs 5, 7, and 8 below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

At the time of the inspection, Dexter Axle failed to comply with the following generator permit exemption conditions and independent TSD requirements.

Use and Management of Containers

1. Under 329 IAC 3.1-7-1 [40 C.F.R. § 262.34(d)(4)], a small quantity generator using a container to hold hazardous waste must ensure that each container includes the date upon which each period of accumulation begins and that the date is clearly marked and visible for inspection. At the time of the inspection, Dexter Axle had not dated at least three containers of aerosol paint cans and the can puncturing unit.
2. Under 329 IAC 3.1-7-1 [40 C.F.R. § 262.34(d)(4)], a small quantity generator using a container to hold hazardous waste must ensure that the container is closed during storage, except when it is necessary to add or remove waste. The lid, cap, hinge or closure device must be of sufficient strength and construction that when closed, the container will fully contain the hazardous waste. At the time of the inspection, Dexter Axle had not kept closed at least three containers of aerosol spray cans.
3. Under 329 IAC 3.1-7-1 [40 C.F.R. § 262.34(d)(4)], a small quantity generator must label or clearly mark each container holding hazardous waste at or near the point of generation with the words "Hazardous Waste." At the time of the inspection, Dexter Axle had not labeled at least three containers of aerosol spray cans and the aerosol spray can puncturing unit used to hold hazardous waste were not labeled or marked with the words "hazardous waste."

Emergency Procedures

4. Under 329 IAC 3.1-7-1 [40 C.F.R. § 262.34(d)(5)(ii)(A)], a small quantity generator must post the name and telephone number of the emergency coordinator next to the telephone or near where hazardous waste was being stored. At the time of the inspection, Dexter Axle did not post the name and telephone number of the emergency coordinator at Hazardous Material Management Building.

Aisle Space

5. Under 329 IAC 3.1-10-1 [40 C.F.R. § 265.35], a small quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes. At the time of the inspection, Dexter Axle had not maintained aisle space in the Hazardous Material Management Building to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.
6. By violating the conditions for a permit exemption in Numbers 1 through 5 above, Dexter Axle became an operator of a hazardous waste storage facility, and was required to obtain a hazardous waste storage permit. Dexter Axle failed to apply for such a permit. Dexter Axle's failure to apply for and obtain a hazardous waste storage permit violated the requirements of 329 IAC 3.1-13 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

OTHER VIOLATIONS

Universal Waste Requirements

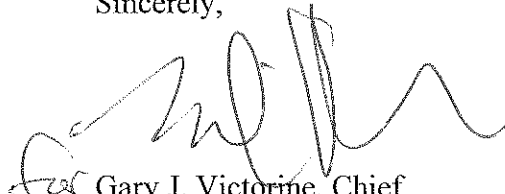
7. Under 329 IAC 3.1-16-1 and 2 [40 C.F.R. § 273.13(d)], a small quantity handler of universal waste lamps must manage lamps in a way that prevents releases of any universal waste or component of universal waste to the environment, by containing lamps in containers or packages that are structurally sound and adequate to prevent breakage. Such containers and packages must remain closed. At the time of the inspection, Dexter Axle had at least five containers of lamps that were not structurally sound, adequate to prevent breakage, and closed.
8. Under 329 IAC 3.1-16-1 and 2 [40 C.F.R. § 273.14(e)], a small quantity handler of universal waste lamps must label or clearly mark each lamp or container or package in which such lamps are contained with any one of the following phrases: "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps." At the time of the inspection, Dexter Axle had at least five containers of lamps that were not labeled with the phrase "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

At this time, EPA is not requiring Dexter Axle to apply for a hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 through 5, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, that you have taken since the inspection to establish compliance with the above conditions and requirements for the Dexter Axle facility. You should submit your response to Diane M. Sharrow, EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Sharrow, of my staff, at 312.886.6199 or at Sharrow.Diane@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Nancy Johnston, Indiana DEM (njohnsto@idem.in.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Dexter Axle Company

EPA ID No.: IND 044 210 8967

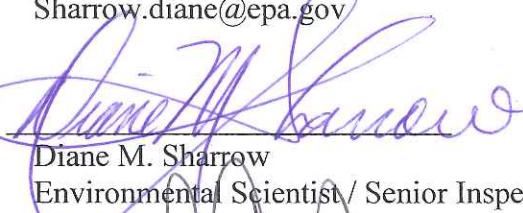
LOCATION ADDRESS: 500 South 7th Street, Albion, Indiana 46701

NAICS CODE(S): 33634 Motor Vehicle Brake System Manufacturing
336399 All Other Motor Vehicle Parts Manufacturing

DATE OF INSPECTION: 13 September 2016

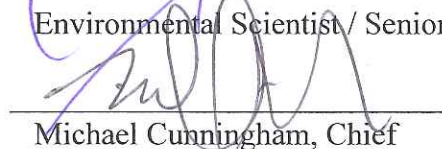
EPA INSPECTOR: Diane M. Sharrow
Environmental Scientist / Senior Inspector
Mail Code LR-8J
Land and Chemicals Division
RCRA Branch
Compliance Section 1
(312) 886-6199 Direct
(312) 692-2906 Facsimile
Sharrow.diane@epa.gov

PREPARED BY:


Diane M. Sharrow
Environmental Scientist / Senior Inspector

31 October 2016
Date

APPROVED BY:


Michael Cunningham, Chief
Compliance Section 1
RCRA Branch

11-02-16
Date

INTRODUCTION

Purpose of Inspection

The purpose of the inspection was to conduct an unannounced Compliance Evaluation Inspection (CEI) at Dexter Axle Company (Dexter Axle), located at 500 South 7th Street, Albion, Indiana. The CEI was conducted to evaluate Dexter Axle's compliance with provisions of the Resource Conservation and Recovery Act (RCRA), and the state and federal regulations related to the generation, treatment and storage of solid waste, hazardous waste, used oil and universal waste.

Background

A CEI to evaluate compliance with certain provisions of the RCRA, including those regulations related to the generation, treatment and storage of hazardous waste, was last conducted at Dexter Axle by staff of the Indiana Department of Environmental Management (Indiana DEM) on March 28, 2013. Dexter Axle is a manufacturer of brake and axle systems for various motor vehicles and trailers. Dexter Axle is located in five buildings in Albion, Indiana.

Dexter Axle notified the United States Environmental Protection Agency (EPA) that it was a generator of hazardous waste on or about November 18, 1980. Dexter Axle re-notified as a large quantity generator (LQG) of hazardous waste on or about March 1, 1990, and subsequently notified as a small quantity generator (SQG) of hazardous waste on or about June 17, 1992. Dexter Axle most recently identified their hazardous waste as D001 and F003.

OPENING CONFERENCE

I arrived at Dexter Axle at approximately 9:00 A.M. EST. I parked my vehicle and entered Dexter Axle's Visitor Entrance. I presented my enforcement credentials to the receptionist and that I was present to conduct an unannounced CEI. The receptionist contacted Randy Rose, Safety Engineer by telephone. While I waited for Mr. Rose, I watched a safety video on "Visitor and Auditor Safety Awareness." I then signed the Training and Acknowledgement Form and signed the Visitor Log, before receiving a Visitor Badge.

When Mr. Rose arrived, I presented my enforcement credentials. I explained that the purpose of my visit was to conduct an unannounced CEI at Dexter Axle. Mr. Rose escorted me to the office of Holly Pfeiffer, Human Resources Manager, where I presented my enforcement credentials to Ms. Pfeiffer and explained the purpose of my visit. Mr. Rose and Ms. Pfeiffer indicated that David Donathen, the HSE Manager was out of town, and that they would like to hold a conference call with Mr. Donathen.

Once Mr. Donathen was connected by speaker telephone, I explained that I had presented my enforcement credentials and explained that I was present to conduct an unannounced CEI at Dexter Axle. Mr. Donathen explained that Dexter Axle was a SQG. He explained further that Dexter Axle was participating in a voluntary remediation program and that approximately four years ago had started in-situ injections, and in 2012 had removed contaminated soil as part of the

remediation that resulted in the submittal of an Annual Report in 2013. He explained further that Dexter Axle had re-notified as a SQG on or about February 24, 2016.

I told Dexter Axle that that during the CEI I would like to complete a review of records and a visual site inspection (VSI). I summarized the records that I would review, and provided Ms. Pfeiffer and Mr. Rose with the U.S. EPA OECA Small Business Information Sheet. I informed both Ms. Pfeiffer and Mr. Rose Dexter Axle could claim any information gathered during the CEI as Confidential Business Information (CBI) including; verbal information, documents and photographs. I also told them that if I needed to take a photograph I would inform them first and they could ensure there was nothing in the photograph that was "confidential" or "protected." Mr. Donathen stated that Mr. Rose and Ms. Pfeiffer would assist me with the Records Review and accompany me on the VSI.

Prior to the start of the Records Review and the VSI, I asked Ms. Pfeiffer and Mr. Rose if Dexter Axle could provide me with a copy of a site diagram that I could use during the VSI. They provide me with an aerial photograph of the Dexter Axle facility with the roads identified and the facility buildings numbered. I also asked them to verify that my personal safety equipment (steel-toed boots, hardhat, earplugs, and safety glasses with side shields) was adequate. They indicated that my safety equipment was adequate.

RECORDS REVIEW

During the Records Review I concentrated on the review of manifests and Dexter Axle's generator status. I noted that in 2015, Dexter Axle had signed a hazardous waste manifest (manifest) on February 17, 2015 that included five 55-gallon drums of D001/F003, and two 55-gallon drums of D001/D035 for a total of approximately 173 kilograms. An additional manifest signed by Dexter Axle on November 4, 2015, included twelve 55-gallon drums of D001/F003 and one 55-gallon drum of D001/D035 for a total of approximately 325 kilograms. I also noted that the manifests were signed by Richard Hurst, who Mr. Rose and Mr. Pfeiffer indicated worked at the Hazardous Materials Building.

During my review of manifests I noted that used oil, quench oil and coolant was picked up at Dexter Axle by National Serv-All of Fort Wayne, Indiana on August 24, 2016 and September 7, 2016. I also noted that the only manifest prepared by Dexter Axle in 2016 was Number 009612477FLE that was dated April 14, 2016, and included twenty-eight 55-gallon drums of D001/F003 and D001/F005 for a total 1540 gallons or approximately 700 kilograms. This copy of the manifest was missing the TSD signature. I pointed this out to Mr. Rose and Ms. Pfeiffer, who contacted Tradebe in East Chicago, Indiana and obtained a copy with the TSD signature prior to my departure.

I also reviewed Dexter Axle's Emergency Plan and located the emergency contacts. Ms. Pfeiffer summarized the training provided and indicated that Dexter Axle has approximately 700 employees in its five buildings and runs three shifts.

VISUAL SITE INSPECTION

Ms. Pfeiffer and Mr. Rose escorted me during the VSI. We first drove around the site and discussed manufacturing activities and waste generation. They indicated that no hazardous waste is generated at Building 5 "Spindle" which is not contiguous to the other four buildings. We then parked the vehicle and walked to the Hazardous Material Management Building located at the southeast corner of Building 1. Mr. Rose introduced me to Mr. Hurst, the Hazardous Material Management Building Specialist. I presented my enforcement credentials to Mr. Hurst and explained the purpose of the VSI.

During the VSI of the Hazardous Material Management Building, I observed the following:

1. There was no posting of emergency contacts;
2. The aisle space in the building was non-existent as the building is used for both material and waste storage and I could not get inspect or examine containers closely because my access was obstructed;
3. There appeared to be only one 55-gallon container of hazardous waste in storage (see Photograph1);
4. There were numerous boxes with aerosol paint cans and bags of aerosol paint cans (see Photographs 2);
5. There was aerosol can puncturing unit located in the northeast corner that was not labeled (see Photograph 3);
6. There were boxes of universal waste amps that were not labeled or closed as well as loose lamps that were not contained (see Photographs 3 and 4); and
7. There were several boxes of aerosol spray cans located outside between Building 1 and the Hazardous Material Management Building (see Photograph 5).

I asked Mr. Hurst about the aisle space. He indicated that the puncturing unit was not operational, so there was a backlog of aerosol spray cans. I asked Mr. Rose and Mr. Hurst if the aerosol spray cans were considered hazardous waste, and both gentlemen indicated that they were, but that some of the cans were going to be returned to product storage as the cans were not empty and the material could still be used. I asked if the boxes of aerosol paint cans were marked as hazardous waste at the point of satellite generation and they indicated that they were not, but were brought to the Hazardous Material Management Building unmarked. I asked Mr. Hurst about the lamps and aerosol paint cans and he indicated that all types of waste are brought to the Hazardous Material Management Building and left without his knowledge and that he must then go through the waste and determine if it is hazardous or universal waste.

We then continued on to the Maintenance Area in Building where used oil is managed. I was introduced to Chris Ayres. I presented my enforcement credentials to Mr. Ayres and explained the purpose of my visit. He indicated where the totes were to store used oil and that they are pumped out and the used oil was sent to Action Environmental using D&B Environmental Transport.

I then concluded the VSI and we returned to the Dexter Axle's offices. During the VSI portion of the CEI, I took five (5) photographs. These 5 photographs are attached to this inspection report and are true and representative of the conditions I observed on the date of the CEI.

CLOSING CONFERENCE

At the end of the CEI, Ms. Pfeiffer, Mr. Rose and I met with Robert Flynn, Director of Operations in a conference room. I presented my enforcement credentials to Mr. Flynn and explained the purpose of my visit. Mr. Donathen was then contacted by telephone and placed on a speaker telephone. I explained that I would review my notes, checklist and photographs and make a compliance decision in consultation with my management. I also explained that I would send a letter to Dexter Axle, along with the inspection report, checklist and photographs. I then concluded the CEI. I returned to my vehicle and departed Dexter Axle at approximately 12:30 P.M. EST.

Attachment(s)

Inspection Checklist
Photographs (5)

Dexter Axle Company INW 044 210 896 PHOTOGRAPH 5

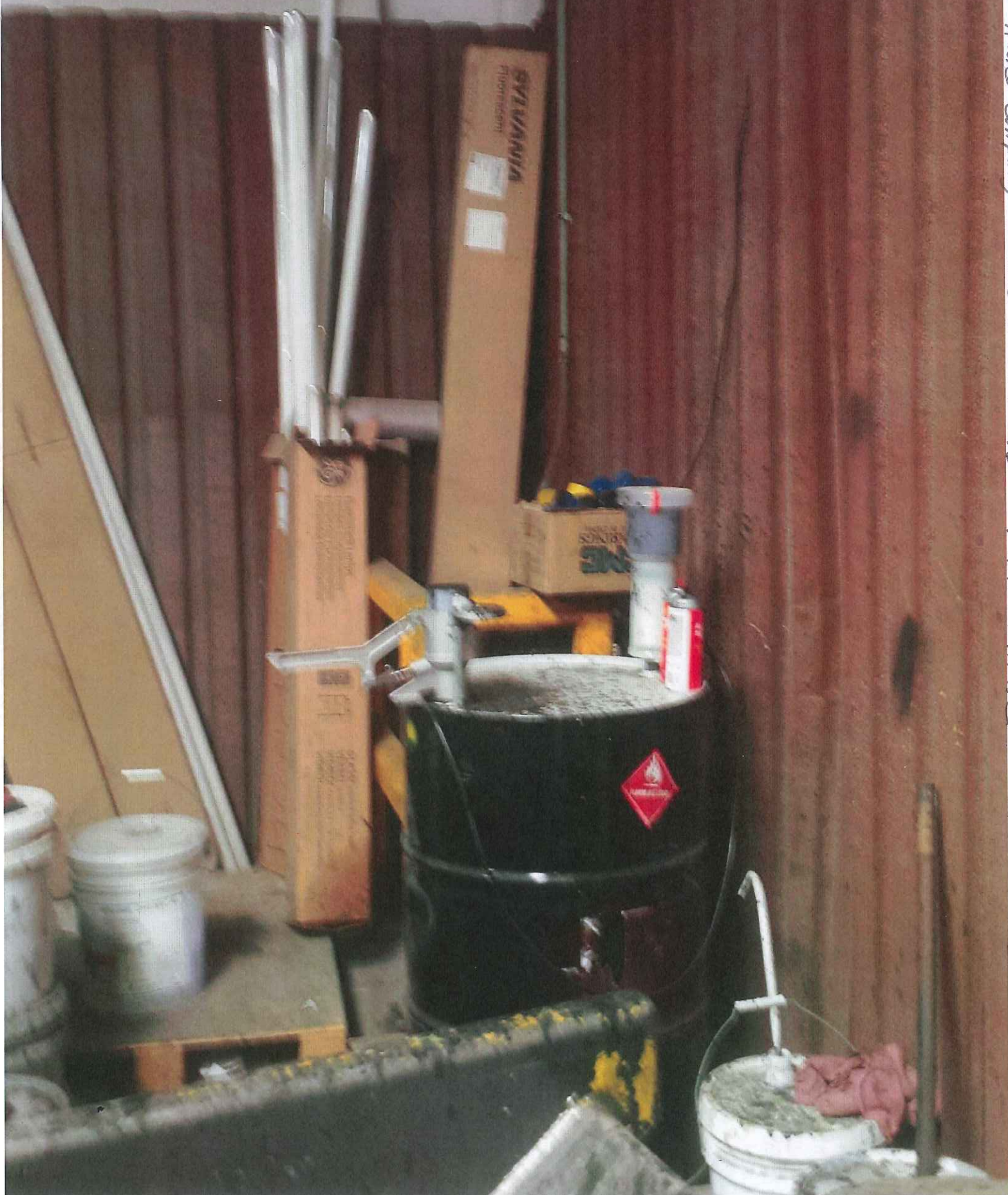


DEXTER Axle Company IND 044 210896 PHOTOSA2H4



WASTE
STORAGE

Dexter Axle Company INV 04430 896 PHOTOGRAPH 3



Dexter Axle Company 1ND 044 210 896 PHOTOGRAPH 3



PHOTOGRAPH 1

[illegible]

Dexter Axle Company
500 So 7th St.
Albion, IN 46701

IND 044210896

U.S. EPA Generator Checklist for Indiana

9/19/2016

PART 262: Standards Applicable to Generators of Hazardous Waste

#	40 CFR	NA = Not Applicable, NI = Not Inspected, OK = In Compliance, DF = Deficiency	NA	NI	OK	DF
GENERAL						
1	262.11	Hazardous Waste Determination (characteristic, listed, TCLP knowledge, exclusions) <i>MSDS provided after CET</i>			✓	<i>Attended</i>
2	262.12(a)	EPA Identification Number (Generator must have ID number)			✓	<i>Both sides of Road</i>
3	262.12(c)	Generator must not offer waste to transporters or facilities that have not received ID number.			✓	
329 IAC 3.1-7/4-6 & 8 & 11	THE MANIFEST		NA	NI	OK	DF
4	262.20	General Requirements (manifest to approved TSD/alt. TSD, SQG reclaim exemption on file)(all required info)			✓	
5	262.21	Manifest Acquisition (generator state 1st, consignment state 2nd)			✓	
6	262.22	Number of Copies (generator, transporters, TSD, & 1 copy returned to generator)			✓	
7	262.23	Manifest Use (signature & date: generator, transporter, TSD, keep copy)			✓	
8	329 IAC 3.1-7-4	Indiana Manifest required for hazardous waste shipped to Indiana TSD Facilities			✓	
9	329 IAC 3.1-7-6	Manifest copies available for review, submitted copies within 5 days after shipping			✓	
PRE-TRANSPORT REQUIREMENTS						
NOTE: If facility treats in < 90 day tanks or containers, see 268.7						
10	262.30, 31, 32, 33	Packaging, Labeling, Marking, Placarding (DOT regulations) (Only apply if waste is in the process of being transported)			✓	<i>Attended</i>
LARGE QUANTITY GENERATORS <i>operating as SGL but generation is at lower level per manifests.</i>						
11	262.34(a)	90 Day accumulation limit: Generator may accumulate on-site for 90 days or less provided that:				<i>Attended</i>
12	262.34(a)(1)	Waste is placed in tanks, containers, containment building, or drip pad				<i>Attended</i>
13	262.34(a)(2)	Container marked with start of accumulation date				<i>Attended</i>
14	262.34(a)(3)	Container/tank marked "Hazardous Waste"				<i>Attended</i>
15	262.34(b)	30 Day extension				<i>Attended</i>
SATELLITE CONTAINERS						
16	262.34(c)(1)	Satellite accumulation (55 gal. maximum or one (1) quart acutely hazardous)				✓
17	262.34(c)(i)	i) Container must be closed when not in use, in good condition, and compatible with waste				✓
18	262.34(c)(ii)	ii) marked "Hazardous waste" or other words, at or near process and under control of operator				✓

Aerosol Cans not empty 261.7/characteristic.

Paint cans

U.S. EPA Generator Checklist for Indiana

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19	262.34(c)(2)	If exceed 55 gal., container must be marked with accumulation date and must be removed within 3 days					✓
SMALL QUANTITY GENERATOR			NA	NI	OK	DF	
20	262.34(d)(e)(f)	SQG Requirements - 180 days or less (unless transported over 200 miles), quantity of hazardous waste on-site 6000 kg. or less, must follow:					
21	262.34(d)(4)	Containers marked with start of accumulation date and words "Hazardous Waste"					✓
22	262.34(d)(4)	Must also comply with 265 Subpart C and I. See pages 4 and 5.					✓
23	262.34(d)(5)	i) Emergency coordinator identified					✓
24	262.34(d)(5)	ii) Following info posted: emergency coordinator, emergency equipment location, phone numbers					✓
25	262.34(d)(5)	iii) Employees must be familiar with <u>handling</u> and emergency procedures					✓
26	262.34(d)(5)	iv) Respond to emergencies	✓				
RECORD KEEPING			NA	NI	OK	DF	
27	262.40	RECORD KEEPING (3 yrs. for copy from manifests, TSD, biennial report, exception report, test results, waste analysis/determination, extension time for unresolved enforcement.)					✓
28	262.41	Biennial Report (due March 1 even numbered years) (LQG ONLY)					✓
29	262.42	Exception Reporting (LQG: >35 days, if no return copy of manifest, contact TSD: >45 days report to IDEM, (SQG: >60 days) transportation report to IDEM)					✓
30	262.43	Additional Reporting, if required by Commissioner (concerning quantities and disposition of wastes in 40 CFR 261)	✓				
31	262.44	SQG Recordkeeping Requirements (keep records for 3 years: manifests, exceptions, waste determination/analysis)					✓
EXPORTS			NA	NI	OK	DF	
32	262.52	General Requirements (notify EPA, accepted by receiving country, EPA consent)	✓				
33	262.53	Notification of Intent to Export	✓				
34	262.54	Special Manifest Requirements for Primary Exporters	✓				
35	262.55	Exception Reports (>45 days from US departure, >90 days from receipt by foreign source/waste returned to US)	✓				
36	262.56	Annual Reports (March 1 annually for waste: types, quantity, frequency, destination, waste reduction send to EPA)	✓				
37	262.57	RECORD KEEPING (3 years for intent to export, EPA acknowledgments, confirmation of delivery, and annual reports)	✓				
IMPORTS OF HAZARDOUS WASTE			NA	NI	OK	DF	
38	262.60	Hazardous Waste Imports (use consignment state's manifest)	✓				

U.S. EPA Generator Checklist for Indiana

9/19/2016

		TSD STANDARDS APPLICABLE TO GENERATORS GENERAL FACILITY STANDARDS (NA for SQG)	NA	NI	OK	DF
39	262.34 / 265.16(a)	Personnel Training (Program Adequacy)			✓	
40	262.34 / 265.16(b)	Personnel received training within six (6) months			✓	
41	262.34 / 265.16(c)	Personnel received annual review			✓	
42	262.34 / 265.16(d)	Training Documents: job titles, job description, type of training, training records			✓	
		PREPAREDNESS AND PREVENTION	NA	NI	OK	DF
43	262.34 / 265.31	Maintenance & Facility Operation (must be maintained & operated to minimize possibility of release) <i>aisle space / bulbs / cans</i>				✓
44	262.34 / 265.32	Required Equipment (a. Internal alarm/communication system b. External/telephone communication c. Fire extinguishers and spill control equipment d. water/foam)			✓	
45	262.34 / 265.33	Testing & Maintenance of Equipment			✓	
46	262.34 / 265.34	Communication & Alarm Access			✓	
47	262.34 / 265.35	Required Aisle Space (to allow movement of spill control and emergency equipment and inspections)				✓
48	262.34 / 265.37	Local Authority Arrangements (police, fire, hospital)			✓	
		CONTINGENCY PLAN & EMERGENCY PROCEDURES (NA for SQG) <i>SQG</i>	NA	NI	OK	DF
49	262.34 / 265.51	Contingency Plan for Facility			✓	
50	262.34 / 265.52	Contingency Plan Content (SPCC plan, local arrangements, emergency coordinator, equipment list, evacuation plan, etc.)			✓	
51	262.34 / 265.53	Contingency Plan Available (on-site, local distribution)			✓	
52	262.34 / 265.54	Contingency Amendments (when regulations change, if plan fails, when facility makes changes)			✓	
53	262.34 / 265.55	Emergency Coordinator available			✓	
54	262.34 / 265.56	Emergency Procedures followed	✓			
		USE & MANAGEMENT OF CONTAINERS	NA	NI	OK	DF
55	262.34 / 265.171	Container Condition (If not in good condition or leaking, must transfer waste or manage in some other way) <i>Paint cans</i>				✓

U.S. EPA Generator Checklist for Indiana

9/19/2016

56	262.34 / 265.172	Waste Compatibility with Container ? Not clear			✓	✓
57	262.34 / 265.173	Container Management (closed/manged to prevent leaks) bulbs paint cans				✓
58	262.34 / 265.174	Inspections (weekly) not based on conditions but reg of SOG's				✓
59	262.34 / 265.176	Ignitable/Reactive Waste (50 ft. set back)			✓	✓
60	262.34 / 265.177	Special Requirements for Incompatible Waste (physical separation/container compatibility)				
LAND DISPOSAL RESTRICTIONS			NA	NI	OK	DF
61	268.3	Dilution prohibited as substitute for adequate treatment			✓	
62	268.7	Waste Analysis, Recordkeeping (LDR Notifications: waste code, whether it is a wastewater or non-wastewater, waste constituents to be monitored if monitoring will not include all regulated constituents, subcategory if applicable, and manifest number.)			✓	
63	268.7 (a)(4)	Treatment in 90-day tanks/containers requires waste analysis plan and testing frequency, filed with Regional Administrator (IDEM), certification of shipment, retained copies on-site (5 yrs.), notifications include: EPA ID #, treatment standards with 5 letter code, and manifest number	✓			
64	268.7(a)(7)	Notifications must be kept on-site for five (5) years			✓	
65	268.9	Listed and characteristic waste codes assigned for listed waste exhibiting characteristic			✓	
66	268.42	Alternative treatment specified for lab packs, mixed waste: most stringent standards	✓			
67	268.45	Treatment standards for hazardous debris corrective action several years ago/removal	✓			
OTHER			NA	NI	OK	DF
68	IC 13-30	Release of contaminants to environment			✓	
69	IAC 3.1-7-8	Facility has waste minimization program as certified on manifest			✓	
70	IC 13-30-2-1 (9)	Does facility have any processes or activities (e.g. waste piles, incinerators, land disposal) which require a permit or interim status? If so, please identify below:	✓			

NOTE: Not ~ 11/18/80 Renot 3/1/90 as LQG renat. as SOG. SOG since 6/17/92

NAICS 33634 Brake & Axle Manuf.
33399 All other Motor Vehicle Parts Manuf.

Last CET by IDEM 3/28/13

Waste Codes: P001 } acetone
(cont roll) → F003 }
U210

Lamps 261.9 273.14 (e) 273.34(e) & 273.13(d); 273.33(d)